

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Ayomide J Aderemi

Debtor

Chapter 13

Bankruptcy No. 24-12739-AMC

TRUSTEE'S MOTION TO DISMISS WITH A BAR ORDER
PURSUANT TO 11 U.S.C. SECTIONS 105 AND 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 08/06/2024.
3. This Motion to Dismiss has been filed for the following reason(s):
 - There has been unreasonable delay as defined by 11 U.S.C Section 1307(c)(1) by the above-captioned Debtor(s).
 - Debtor(s) has/have failed to comply with provisions of the Plan by not making post-petition mortgage payments.
4. The debtor has filed two prior bankruptcy cases, either individually, or jointly with a spouse, as follows:
 - (1) 19-12530-JKF, Chapter 13, filed by Ayomide J. Aderemi on April 18, 2019. The case was dismissed on Trustee's Motion to Dismiss on October 21, 2019 due to Feasibility and Underfunding.
 - (2) 20-11784-JKS (NJB), Chapter 13, filed by Ayomide J. Aderemi on February 3, 2020. The case was dismissed per Debtor's Motion to Voluntarily Dismiss Chapter 13 Bankruptcy on March 30, 2020.

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, respectfully requests that, pursuant to 11 U.S.C. Sections 105 and 1307, the Court enter an Order dismissing this case and barring the debtor from filing another bankruptcy petition, either individually or jointly with a spouse, without prior leave of Court FOR A PERIOD OF ONE YEAR.

Date: 03/10/2025

Respectfully submitted,

/s/ Ann Swartz, Esq.

Ann Swartz, Esq.

for

Scott F. Waterman, Esq.

Standing Chapter 13 Trustee

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